

**REMARKS**

Claims 1, 4, 6-7, 10 and 12-15 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,125,201 to Zador. The method of claim 1 includes representing error data as a collection of ordered bits, coding the bits of each order to indicate zerotree roots that are associated with the order, and performing wavelet transformations on the image with error data to provide wavelet coefficients for a wavelet transformed error image. However, the Zador reference fails to teach or suggest these limitations in claim 1. In this manner, claim 1 is not anticipated by the Zador reference and allowance of claim 1 and the claims depending therefrom is respectfully requested of the Examiner.

Rather than representing error data as a collection of ordered bits, the Zador reference merely teaches that a resolution of 16 bits for coefficients in color conversion stage and 12 bits per image color plane in signal processing stage is needed. See column 7, lines 54-60 in the Zador reference. Likewise, instead of coding the bits of each order to indicate zerotree roots that are associated with the order, the Zador reference merely teaches a scheme for labeling zero-tree roots, for example, in column 23, lines 11-22 in the Zador reference. In this manner, neither the representation of error data as a collection of ordered nor coding of the bits of each order to indicate zero roots that are associated with the order are taught by the Zador reference.

Claim 1 includes the limitation that performing wavelet transformations on the image with error data to provide wavelet coefficients for a wavelet transformed error image. The Zador reference fails to teach this limitation. In contrast, the Zador reference in column 8, lines 60 simply teaches transforming the image data from the original image space to a desired transformed space with an appropriate wavelet filter transform. Likewise, in column 13 of the Zador reference, application of a wavelet transformed through a known image is indicated. However, nowhere does the Zador reference performs wavelet transformations on the image with error data to provide wavelet coefficients for a wavelet transformed error image. The Examiner is respectfully requested to specifically point out these the teachings as to performing wavelet

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transformation, representing error data, coding the bits of each order as indicated above. Absent such teachings, all the claim limitations of claim 1 are not anticipated by the Zador reference.

Accordingly, the Examiner is respectfully requested to reconsider the § 102 rejection of claim 1. In this manner, claim 1 and the dependent claims therefrom are in condition for allowance.

Claims 2-3 and 8-9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the Zador reference and in view of U.S. Patent No. 6,157,746 to Sodagar et al. (hereinafter, "Sodagar"). Claim 2 calls for determining which of the bits indicate zeros and classifying each zero as either an isolated zero or a zerotree root. Rather than determining which of the bits indicate zeros, in the Sodagar reference, a coefficient value is used from a node in a wavelet tree to determine whether a node is a zerotree root. See column 2, line 32 and column 8, lines 2-3 in the Sodagar reference.


Again, the Examiner is respectfully requested to specifically point out where the Sodagar reference determines which of the bits indicate zeros to classify each zero as either an isolated zero or a zerotree root. Accordingly, absent such teaching, claim 2 is not rendered obvious in a *prima facie* manner in view of the Zador and Sodagar references regardless of whether considered in combination or separately. Therefore, claim 2 patentably distinguishable over the prior art cited by the Examiner. Allowance of claim 2 is thus requested by the Applicant in view of the reasons provided above. The Examiner is respectfully requested to reconsider all the pending claims.

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In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested.

Respectfully submitted,

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